



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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August 29, 2008

Mr. Joseph B. Card  
CAVU Ops, Inc.  
P.O. Box 10159  
Terre Haute, IN 47801

Re: Remediation Work Plan  
Response To Comments  
Former Western Tar Site  
2525 Prairieton Road  
Terre Haute, Indiana  
VRP #6990902

Dear Mr. Card:

This office has completed review of Keramida Environmental's response letter dated May 30, 2008 which was submitted in response to agency review comments (dated April 1, 2008) regarding the previously submitted (May 21, 2007) revised Remediation Work Plan (RWP) for the Western Tar (Railworks) site in Terre Haute, Indiana.

Rather than address many of the comments presented in the agency's April 1<sup>st</sup> correspondence, the submitted responses simply restated the information on which IDEM had previously commented. Though the same contaminants are spread across the property, there seem to be areas with higher concentrations (likely source areas) and areas with lesser levels of contamination (perhaps incidental contamination). Insufficient information is present to state with confidence that this is all one large source area. Though a 10 X 10 grid may have been approved for investigation in the past, IDEM did not approve removing only the contaminated 10 X 10 grids without determining whether there is contamination between sample points. This would be acceptable if all grids were sampled, but they were not, and to do so would represent an excessive sampling effort. Instead, further investigation of surface soils should be conducted in the vicinity of contaminated sample locations to determine the extent of the source area represented by that sample. In that way a more reasonable and protective method to remediate the contamination can be implemented.

Furthermore, IDEM's April 1<sup>st</sup> letter stated (as previously stated in formal agency correspondence dated August 15, 2007)

*given the degree of uncertainties associated with the limited scope of the proposed remediation...and potential risks from the subsurface soil and groundwater that are known to exist, but have not been fully evaluated...it is difficult for IDEM to evaluate or approve a closure plan for such a limited aspect of the risks associated with the site.*

This position was further clarified in e-mail correspondence from IDEM to Keramida on April 10, 2008:

*A full evaluation of contamination stemming from the source (surface soil), including contamination to subsurface soil and groundwater, is necessary in order for the agency to appropriately consider or evaluate any remedial plan. Although program guidance from 12-years ago did somewhat offer the flexibility to limit which media to address, this just doesn't seem to work for this site given the amount of unknowns, and that contamination does not appear to stop at horizontal boundaries imposed by the grid system or at vertical boundaries imposed by the definition of surface soil.*

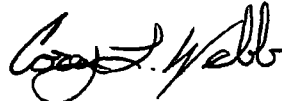
IDEM's April 1<sup>st</sup> letter concluded that

*unless a more thorough evaluation of potential risks associated with the contamination at the site can be performed, and the full horizontal extent (beyond site boundaries and predetermined project area boundaries) and vertical extent (beyond the confines of the surface soil medium, including any migration into subsurface soil and groundwater) of contamination can be delineated, our intention is to reject the RWP and consider terminating the Voluntary Remediation Agreement.*

The position of this agency remains firm; IDEM does not intend to approve a RWP for this site that only addresses surface soil. As such, and in the absence of a commitment from CAVU Ops Inc. to submit a plan that addresses the full extent of contamination in all impacted media, IDEM does not foresee any value in scheduling another meeting with Keramida (as requested in the May 30<sup>th</sup> response letter) to further discuss this issue or the extent of delineation required at the site. As previously stated, in the absence of such a commitment or plan, our intention is to reject the RWP and thereby terminate the Voluntary Remediation Agreement. IDEM will anticipate a formal written response within 30-days from the date of this letter indicating CAVU Ops' intentions. If CAVU Ops intends to submit a plan that addresses the full extent of contamination in all impacted media, IDEM is amenable to scheduling a meeting to discuss. If CAVU Ops can not commit within 30-days to the submittal of a plan that addresses the full extent of contamination in all impacted media, IDEM will proceed with rejection of the RWP as previously advised, the termination of the Voluntary Remediation Agreement, and by extension, CAVU Ops' participation in the VRP.

If you have any questions, please contact me at (317)234-0970, (800) 451-6027, or at [cwebb@idem.in.gov](mailto:cwebb@idem.in.gov).

Sincerely,



Corey Webb,  
Senior Environmental Manager  
Voluntary Remediation Program  
Office of Land Quality

cc: Scott Randall, Keramida Environmental; 401 N. College Ave., Indpls. IN 46202  
Andrew Gremos, Keramida Environmental; 401 N. College Ave., Indpls. IN 46202  
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